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August 1, 2003

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

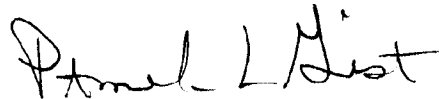
Re: **CC Docket 94-102**
Enhanced 911 Tier III Interim Report
North Carolina RSA 3 Cellular Telephone Company
d/b/a Carolina West Wireless

Dear Ms. Dortch:

On behalf of the above-referenced carrier there is transmitted herewith a narrative statement regarding the company's E-911 deployment and implementation status. The filer is a Tier III carrier submitting its Interim Report in accordance with the provisions of the Commission's Order in *Revision of Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket 94-102, Order To Stay (rel. July 26, 2002) and the subsequent FCC Public Notice released June 30, 2003, DA 03-2113.

If questions arise with regard to this filing, please contact the undersigned.

Very truly yours,



Pamela L. Gist

**North Carolina RSA 3 Cellular Telephone Company
d/b/a Carolina West Wireless**

Interim Report of the Status of Enhanced 911 Phase II Compliance

Item I: Number of Phase I and Phase II Requests from PSAPs

- A. There are seven eligible PSAPs for W911 service within the service area of Carolina West
- B. Eligible PSAPs are : Alleghany County, NC; Ashe County, NC; Avery County, NC; Surry County, NC; Watauga County, NC; Wilkes County, NC and the City of Boone, NC .
- C. Carolina West responded to the requests from six PSAPs for Phase I and began service to the first of these PSAPs in June of 2000. All six PSAPs were in service by the end of December 2000. Carolina West was the first wireless company to serve all of the requested PSAPs in its area in the State of North Carolina (as reported by the NC Wireless 911 Board).
- D. At the present time the following PSAPs have filed requests for Phase II: Alleghany County, Avery County, Surry County, Watauga County, Wilkes County and the City of Boone. Carolina West is preparing to serve all of these requests as soon as the installation of the CDMA overlay and Phase II system is complete. The remaining PSAP at Ashe county is being included in all preparations for Phase II although it has not yet filed a valid request. Two of the PSAPs have not met all of the details in their application to be considered as a FCC valid request but are being included in the provisioning of the system and will be served as soon as it is available and they are ready for implementation.

Item II: Carrier's Specific Technology Choice

- A. The original choice was network-based technology. Continued negotiation with two suppliers of this technology began in late 2000 and continued until April 2002. At that time the decision was made to end attempts to obtain network-based technology.
- B. A supplier's proposal to provide a handset-based solution was approved and signed on May 15, 2003. Notice of Carolina West's change of election was filed with the FCC on May 23, 2003.

Item III: Status of Ordering and/or Installation of Necessary Network Equipment

- A. Work is already beginning to assemble the needed information and equipment under a contract with TeleCommunications Systems, Inc. (TCS).
- B. To date no problems of significance have been encountered with provisioning of the handset based equipment and software.
- C. A problem exists that to use the selected handset-based technology the expansion of the system using Code Division Multiple Access (CDMA) Technology must be completed before the required location accuracy can be

obtained. This upgrade will not be in service before December 2003. (See Item V. below.)

- D. Since this would affect the PSAPs who have requested service, each of the PSAPs were contacted and the plan to implement Phase II service in January of 2004 was explained. Each of the affected PSAPs has indicated its willingness to accept this plan.

Item IV: ALI-Capable Handset Availability

Handset suppliers to Carolina West indicate that location capable CDMA handsets are available. Carolina West will begin offering CDMA location capable handsets for customer purchase by the September 1, 2003 deadline as defined by the FCC. The installation of the CDMA network will not be completed at that time hence customer acceptance of location capable handsets is expected to be weak.

Item V: Estimated Date on Which Phase II Service Will First Be Available

The estimated date is January 2004 as outlined in Item III C above. This date is subject to the final approval and execution of a Rural Utilities Service Special Equipment Contract. The approval process has been slower than anticipated, putting timely CDMA network equipment delivery at risk. While it is anticipated that the contract will be finalized in the near future, further delays in approval could force significant delay's in the projected January 2004 completion date. Carolina West will stay in close communication with each of the affected PSAPs regarding the schedule as it develops this fall and winter.

Item VI: Information on Whether the Carrier Is on Schedule to meet the Ultimate Implementation date of December 31, 2005

At this time the only problem of meeting the requirement of FCC for December 31, 2005 is how to get all existing customers to change out their sets for the required CDMA ALI capable set. We have a low rate of churn with some of the original system customers from 1990 still using the large bag phones and high power analog phones. In addition, customers using existing TDMA technology phones will have to be persuaded to change their customer owned sets out to the new technology. Carolina West plans to request funds from the NC State Wireless 911 Fund to purchase the required replacements to meet the mandated FCC requirement of December 31, 2005.

A F F I D A V I T

County of Wilkes)
)
State of North Carolina) SS.

I, Hobart G. Davis, having been first duly sworn, depose and state as follows:

1. I am President for North Carolina RSA 3 Cellular Telephone Company, Inc. DBA/Carolina West Wireless.
2. I am familiar with the facts contained in the foregoing Interim Report of the status of Enhanced 911 Phase II compliance, and verify that those facts are true and correct to the best of my knowledge and belief, except that I do not attest to those facts which are subject to official notice by the Commission.

I declare under penalty of perjury that the foregoing is true and correct.

Hobart G. Davis

Hobart G. Davis

President

NC RSA 3 Cellular Telephone Company, Inc
DBA/Carolina West Wireless

Subscribed to and sworn to before me
this 17th day of July, 2003.

Audrey Gambill Holzkamm
Notary Public

Audrey Gambill Holzkamm

My commission expires: Oct. 14, 2007

seal



CERTIFICATE OF SERVICE

I, Daniel Ladmirault, an employee in the law offices of Lukas, Nace, Gutierrez & Sachs, Chartered, do hereby certify that I have on this 1st day of August, 2003, sent by hand-delivery, a copy of the foregoing Enhanced 911 Tier III Interim Report of North Carolina RSA 3 Cellular Telephone Company d/b/a Carolina West Wireless to the following:

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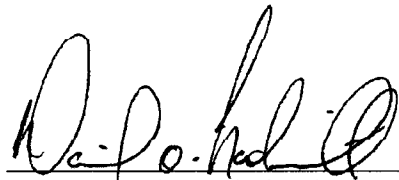
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Daniel Ladmirault

*via hand-delivery